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9 *Aria Resort & Casino, LLC*

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 PATRICIA A. WILLIAMS,

Case No. 2:17-cv-01484-JCM-VCF

13 Plaintiff,

14 vs.

15 ARIA RESORT & CASINO HOLDINGS,
16 LLC, a Nevada limited liability company; and
17 ARIA RESORT & CASINO, LLC, a Nevada
18 limited liability company,

**STIPULATION AND ORDER TO
EXTEND DISCOVERY AND
DISPOSITIVE MOTION
DEADLINES**

19 Defendants.

(First Request)

20 The parties, by and through their respective counsel of record, hereby stipulate and agree as
21 follows:

22 1. On January 8, 2018, this Court entered an Order granting the Stipulated Discovery
23 Plan and Scheduling Order submitted by the parties.

24 2. This is the first request by the parties to amend the Court's January 8, 2018
25 Scheduling Order.

26 3. The parties stipulate and agree to extend the discovery and expert disclosure
27 deadlines for sixty (60) days to allow the parties to coordinate multiple schedules and conduct
28 necessary depositions in order to fully evaluate the claims and defenses presented.

1 **STATEMENT OF DISCOVERY THAT HAS BEEN COMPLETED**

2 Defendant served the following:

- 3 a. Initial Disclosures on February 21, 2018; First Supplemental Disclosures on
4 June 4, 2018.
- 5 b. Responses to Plaintiff's First Set of Requests for Production of Documents
6 on June 4, 2018;

7

8 Plaintiff served the following discovery requests:

- 9 a. Initial Disclosures on September 5, 2017.
- 10 b. First Set of Request for Production of Documents on January 18, 2018;

11 **STATEMENT OF DISCOVERY THAT REMAINS TO BE COMPLETED**

12 The parties are currently in the process of conducting written discovery. Defendant intends
13 to take Plaintiff's deposition and Plaintiff also intends to depose various members of Defendant's
14 management team. For the above stated reasons, the parties request that the discovery deadline
15 be extended sixty (60) days from June 25, 2018 to August 24, 2018.

16

17 **PROPOSED SCHEDULE**

18 The parties stipulate and agree that:

- 19 1. **Discovery**: The discovery period shall be extended sixty (60) days from June 25,
20 2018 to August 24, 2018.
- 21 2. **Expert Disclosures**: The deadline to disclose experts shall be extended up to and
22 including, June 25, 2018, which is sixty (60) days before the proposed discovery deadline.
23 Disclosure of rebuttal experts will be due July 25, 2018, which is thirty (30) days before the
24 proposed discovery deadline.
- 25
- 26 3. **Dispositive Motions**: The parties shall have through and including September 24,
27 2018, to file dispositive motions, which is thirty (30) days after the discovery deadline.
- 28

4. **Pre-Trial Order:** If no dispositive motions are filed, the Joint Pretrial Order shall be filed thirty (30) days after the date set for the filing of dispositive motions. Therefore, the Joint Pretrial order shall be filed no later than October 24, 2018. In the event dispositive motions are filed, the date for filing the Joint Pretrial Order shall be suspended until thirty (30) days after decision on the dispositive motions or by further order of the Court.

This stipulation and order is sought in good faith and not for the purpose of delay. No prior request for any extension of scheduling deadlines has been made.

Dated: June 4, 2018.

Dated: June 4, 2018.

/s/Lisa A. McClane
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*Attorneys for Defendant Aria Resort &
Casino, LLC*

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ORDER

IT IS SO ORDERED this 11 day of ~~May~~ June, 2018.

June

~~United States District Judge~~
United States Magistrate Judge